

1 WILLIAM A. ISAACSON (*Pro hac vice*)
 (wisaacson@bsfllp.com)
 2 STACEY K. GRIGSBY (*Pro hac vice*)
 (sgrigsby@bsfllp.com)
 3 NICHOLAS WIDNELL (*Pro hac vice*)
 (nwidnell@bsfllp.com)
 4 BOIES SCHILLER FLEXNER LLP
 1401 New York Avenue, NW
 5 Washington, DC 20005
 Tel: (202) 237-2727; Fax: (202) 237-6131
 6

RICHARD J. POCKER #3568
 (rpocker@bsfllp.com)
 BOIES SCHILLER FLEXNER LLP
 300 South Fourth Street, Suite 800
 Las Vegas, Nevada 89101
 Tel: (702) 382-7300; Fax: (702) 382-2755
 7
 8
 9

DONALD J. CAMPBELL #1216
 (djcc@campbellandwilliams.com)
 10 J. COLBY WILLIAMS #5549
 (jcw@campbellandwilliams.com)
 11 CAMPBELL & WILLIAMS
 700 South 7th Street
 12 Las Vegas, Nevada 89101
 Tel: (702) 382-5222; Fax: (702) 382-0540
 13
 14

*Attorneys for Defendant Zuffa, LLC, d/b/a
 Ultimate Fighting Championship and UFC*
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17 **UNITED STATES DISTRICT COURT**
 18 **DISTRICT OF NEVADA**

19 Cung Le, Nathan Mr. Quarry, Jon Fitch, Brandon
 20 Vera, Luis Javier Vazquez, and Kyle Kingsbury,
 on behalf of themselves and all others similarly
 21 situated,

22 Plaintiffs,

23 v.

24 Zuffa, LLC, d/b/a Ultimate Fighting
 Championship and UFC,

25 Defendant
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No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF STACEY K.
 GRIGSBY IN SUPPORT OF ZUFFA,
 LLC'S MOTION TO SEAL
 PORTIONS OF PLAINTIFFS' REPLY
 IN SUPPORT OF PLAINTIFFS'
 MOTION TO COMPEL DEFENDANT
 TO PRODUCE A LOG OF
 COMMUNICATIONS FOR DANA
 WHITE'S DISCOVERABLE
 TELEPHONE NUMBERS AND
 ELECTRONIC COMMUNICATION
 DEVICES AND DIRECTING
 DEFENDANT TO SUBMIT AN
 INVENTORY OF ELECTRONIC
 COMMUNICATION DEVICES AND
 RELATED DOCUMENTS (ECF No.
 417)**

1 I, Stacey K. Grigsby, declare as follows:

2 1. I am over 21 years old and have personal knowledge of the information in this
3 declaration. I am a member in good standing of the bars of the District of Columbia and the state of
4 New York. I am admitted pro hac vice to practice before this Court. I am a partner in the law firm
5 Boies Schiller Flexner LLP, counsel for Zuffa, LLC (“Zuffa”) in the above captioned action in the
6 U.S. District Court for the District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFP-PAL.

7 2. Except where otherwise stated, based on my review of the files, records, and
8 communications in this case, I have personal knowledge of the facts set forth in this Declaration and,
9 if called to testify, could and would testify competently to those facts under oath.

10 3. I make this declaration in support of Zuffa’s Motion to Seal Portions of Plaintiffs’
11 Reply in Support of Plaintiffs’ Motion to Compel Defendant to Produce a Log of Communications
12 for Dana White’s Discoverable Telephone Numbers and Electronic Communication Devices and
13 Directing Defendant to Submit an Inventory of Electronic Communication Devices and Related
14 Documents (ECF No. 417) (“Motion to Seal”).

15 4. Zuffa seeks to seal two exhibits in their entirety, limited portions of three exhibits,
16 and limited portions of Plaintiffs’ Reply in Support of Plaintiffs’ Motion to Compel Defendant to
17 Produce a Log of Communications for Dana White’s Discoverable Telephone Numbers and
18 Electronic Communication Devices and Directing Defendant to Submit an Inventory of Electronic
19 Communication Devices and Related Documents (ECF No. 417) (“Reply”).

20 5. Federal Rule of Civil Procedure 26(c) provides that the Court may “issue an order to
21 protect a party or person from annoyance, embarrassment, oppression or undue burden or expense”
22 by “requiring that a trade secret or other confidential research, development, or commercial
23 information not be revealed or be revealed only in a specific way.” Documents filed in connection
24 with a non-dispositive motion like the Motion to Compel may be sealed if the party seeking to seal
25 the documents makes a “particularized showing” under the “good cause” standard of Rule 26(c).
26 *Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1180 (9th Cir. 2006) (citation and internal
27 quotation marks omitted).

6. I understand that Zuffa has a strict policy of zealously protecting the medical information, including injury information and other health information, of its athletes and treats such information as highly confidential.

7. I further understand that Zuffa has a policy of not disclosing the offers it makes to athletes regarding issues relating to their confidential contracts. I also understand that Zuffa keeps its negotiations with respect to athlete contracts and bout agreements confidential as to internal discussions and evaluations of athletes.

8. I further understand that Zuffa keeps its internal business discussions regarding ticket pricing and event logistics highly confidential and that Zuffa, as a private company, does not publicly disclose information regarding its event logistics practices and also does not disclose information regarding athlete compensation and benefits except where required by law or athletic commission rule.

9. I understand that Dana White keeps his mobile numbers private and does not generally disclose this information.

10. Furthermore, I only provide my personal conference line and mobile number for business purposes and do not publish these numbers to the general public.

11. Exhibit 40 to this declaration is a true and correct copy of Exhibit 40 to Plaintiffs' Reply with redactions added.

12. Exhibit 41 to this declaration is a true and correct copy of Exhibit 40 to Plaintiffs' Reply with redactions added.

13. Exhibit 42 to this declaration is a true and correct copy of Exhibit 40 to Plaintiffs' Reply with redactions added.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 5th day of June, 2017, in Washington, DC.

/s/ Stacey K. Grigsby

Stacey K. Grigsby